

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

RANDY YOUNG,

Plaintiff,

v.

**Civil Action No. 2:23-cv-00764
Honorable Thomas E. Johnston**

**WESTERN-SOUTHERN AGENCY, INC.
a/k/a WESTERN & SOUTHERN
FINANCIAL GROUP, WESTERN-
SOUTHERN LIFE ASSURANCE
COMPANY a/k/a WESTERN &
SOUTHERN LIFE INSURANCE
COMPANY,**

Defendants.

**UNOPPOSED MOTION TO ENLARGE TIMEFRAME FOR THE PLAINTIFF
TO AMEND HIS COMPLAINT AND DEADLINES SET FORTH IN
ORDER AND NOTICE OF THE COURT DATED SEPTEMBER 24, 2024**

NOW COMES the Plaintiff, with agreement of the Defendant, and moves this Court to enlarge the time in which the Plaintiff has to file his Amended Complaint. Based on the Court's Order of September 19, 2024, the Plaintiff was given 21 days to file his Amended Complaint. Due to the fact that counsel for the Plaintiff will be gone for a period of two and a half weeks, counsel for Defendant, based upon a request from the counsel for the Plaintiff, has agreed to consent to permit the Plaintiff to file his Amended Complaint by October 21, 2024. The Amended Complaint is presently due to be filed by October 11, 2024 and this would extend the deadline until October 21, 2024.

The Plaintiff, also with the consent of the Defendant, moves the Court to amend the Order and Notice entered by the Court on September 24, 2024. Counsel moves the Court to extend the date for filing of:

Motions Under FR Civ P 12(b) from October 21, 2024 to November 1, 2024;
Last Day for Rule 26(f) Meeting from November 4, 2024 to November 14, 2024;
Last Day to File Report of Parties' Planning Meeting and Scheduling Order Worksheet from
November 11, 2024 to November 21, 2024;
Scheduling Conference to be scheduled for November 27, 2024 at a time to be set by the
Court;
Last Day to Serve FR Civ P 26(a)(1) Disclosures from November 29, 2024 to December 5,
2024.

WHEREFORE, with the agreement and consent of the Defendant, the Plaintiff moves this
Court to alter and amend its previous Order and Order and Notice to the dates set forth above and for
any other such relief as this Court deems just and proper.

Randy Young,

By Counsel,

/s/ Charles R. Bailey
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Defendants.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing **Unopposed Motion to Enlarge Timeframe for the Plaintiff to Amend his Complaint and Deadlines Set Forth in Order and Notice of the Court Dated September 24, 2024** was served upon the following parties through the Court's Electronic Case Filing (ECF) system on this day, Friday, October 4, 2024:

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Attorney For: Defendants

/s/ Charles R. Bailey
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